

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

STUDENTS FOR JUSTICE IN  
PALESTINE AT THE UNIVERSITY OF  
HOUSTON, et al.,

Plaintiffs,

v.

GREG ABBOTT, *in his official capacity only as  
the Governor of the State of Texas*, et al.,

Defendants.

No. 1:24-CV-523-RP

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**DECLARATION OF PAUL KITTLE**

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I, Paul Kittle, have personal knowledge, or knowledge based on my review of business records of the University of Houston, of all statements below. I hereby swear, affirm, and attest to the following:

1. My name is Paul Kittle. I am over eighteen years of age, of sound mind and am otherwise competent to make this Declaration. All of the facts contained herein are within my personal knowledge and are true and correct.

2. I am the Vice Chancellor/Vice President of Student Affairs at the University of Houston (“UH”). I have been in this role for approximately six months.

3. My office handles the campus speech and free expression policies. These policies provide the rules for what conduct and forms of free expression are permitted on campus. MAPP 01.05.01 (Freedom of Expression), SAM 01.D.15 (Freedom of Expression – System) and 3.01.05 (Posting Flyers on University Kiosks). Some of these include where students are permitted to congregate, sound limitations, and what protocols are in place for registering events. These policies, procedures and requirements apply to all Registered Student Organizations (“RSO”) and activities that are planned on campus, regardless of purpose or subject matter.

4. Throughout the Spring of 2024, I had been tracking the activity related to the Israeli-Palestinian conflict that was taking place on university campuses nationwide, and knew that many universities were dealing with highly disruptive protests and encampments, and proliferating antisemitism. I attended a meeting with the Association of Public and Land Grant Universities about

how best to deal with student encampments to prevent major disruptions to a university's educational mission.

5. In the Spring of 2024, students began conducting more protests on UH's campus. Campus officials track those activities to ensure there are no conflicts with space usage on campus.

6. In approximately April 2024, SJP members were in Butler Plaza on UH's campus chalking messages on sidewalks. This was a violation of the University's anti-chalking policies and was tantamount to graffiti. The University power washed the messages and the students returned the next day to re-write the messages. After two consecutive days of power washing the messages, the students stopped.

7. On April 17, 2024, I met with members of Students for Justice in Palestine, along with their faculty advisor, Dr. David McNally, and other members of UH's administration. The purpose of the meeting was to discuss how GA-44 would be worked into University policies on our campus and throughout the UH system. The SJP students raised the issue of chalking. University personnel reiterated the policy regarding chalking and also stressed that buildings are not all open forums for free expression.

8. On April 25, 2024, UH administrators met with Hillel to understand their concerns. The University explained that GA-44 would be implemented into freedom of expression and anti-discrimination policies but that the sentiment is not different from current policies, which already prohibited disruptions to campus educational functions and extended protections based on national origin, race, religion, sex, and all other protected categories consistent with state and federal law.

9. Between April 22 and April 25, 2024, students organized in the student center. They wore t-shirts and wrote signs with "Free Palestine" messaging. After students began affixing signs to the wall, they were asked to take them down because UH's policies do not permit protest-related signs inside the Student Center or other campus buildings—regardless of the content or viewpoint being expressed. The students who were hanging signs were escorted out of the Student Center.

10. By April 25, 2024, SJP escalated its protests. Approximately 50-75 students assembled in the main entrance of the student center with banners and flags. They were shouting and standing on furniture. Eventually they dispersed.

11. On May 8, 2024, I arrived early on campus to find an encampment on the steps of Butler Plaza, which is outside one of the libraries. Approximately 70 students were organized, as truly and accurately depicted in the photograph below:



12. Students were told they could not have an encampment due to state laws about camping on state property. Two students were arrested following a confrontation with UH police. It was also discovered that students had taken University property to aid in their encampment. Specifically, the students took wood pallets that are used to transport items across campus and used them as barricades in Butler Plaza (see below). A Palestinian flag was placed on the makeshift barricade.

13. Attached hereto as **Exhibit A** (file name IMG\_8035) is a true and accurate copy of video footage showing the encampment at Butler Plaza on May 8, 2024.

Further declarant sayeth naught

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF TEXAS AND THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on August 16, 2024.



Paul Kittle,  
Vice President of Student Affairs at the  
University of Houston

**EXHIBIT A**

*Video footage of May 8, 2024 SJP encampment in Butler Plaza at UH, file name IMG\_8035*

This exhibit constitutes a video recording, a copy of which has been delivered to the Court.